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FILED

SEP 15 2022

Clerk, U S District Court
District Of Montana
Billings

gdn

**ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ALEXANDRE ZDENEK DAVIS,

Defendant.

CR 22- 106 -BLG- DLC

INDICTMENT

**FALSE STATEMENT DURING
FIREARMS TRANSACTION**

(Count 1)

Title 18 U.S.C. § 922(a)(6)

**(Penalty: Ten years of imprisonment,
\$250,000 fine and three years of supervised
release)**

**FELON IN POSSESSION OF A
FIREARM**

(Count 2)

Title 18 U.S.C. § 922(g)(1)

**(Penalty: Ten years of imprisonment,
\$250,000 fine, and three years of supervised
release)**

**AGGRAVATED IDENTITY THEFT
(Count 3)**

Title 18 U.S.C. § 1028A(a)(1)

**(Penalty: Mandatory minimum two years
of imprisonment, consecutive to any other**

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| | punishment, \$250,000 fine, and one year of supervised release) FORFEITURE Title 18 U.S.C. § 924(d) |
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THE GRAND JURY CHARGES:

COUNT 1

That on or about March 24, 2021, at Billings and within Yellowstone County, in the State and District of Montana, the defendant, ALEXANDRE ZDENEK DAVIS, in connection with his acquisition of a firearm from Cabela's, a licensed firearms dealer, knowingly made a false and fictitious written statement to that dealer which was likely to deceive Cabela's, as to a fact material to the lawfulness of such acquisition of said firearm by the defendant under chapter 44 of Title 18, that is, the defendant represented on an ATF Firearms Transaction Record Form 4473 that that he was John Doe 1, a victim whose identity he had stolen, and that DAVIS had not previously been convicted by a court of a felony, when in truth and fact, he was not John Doe 1 and had previously been convicted of a felony in a United States Army Court Martial, in violation of 18 U.S.C. § 922(a)(6).

COUNT 2

From on or about March 24, 2021 until on or about August 4, 2021, at Billings and within Yellowstone County, in the State and District of Montana, and elsewhere, the defendant, ALEXANDRE ZDENEK DAVIS, knowing he had been

convicted on or about October 22, 2019, of a crime punishable by a term of imprisonment exceeding one year under the laws of the United States, knowingly possessed, in and affecting interstate commerce, a firearm, in violation of 18 U.S.C. § 922(g)(1).

COUNT 3

On or about March 24, 2021, at Billings, within Yellowstone County, in the State and District of Montana, the defendant, ALEXANDRE ZDENEK DAVIS, did knowingly use, without lawful authority, a means of identification of another person, during and in relation to a felony violation of 18 U.S.C. § 922(a)(6), false statement during a firearms transaction, as charged in count 1 above, in violation of 18 U.S.C. § 1028A(a)(1).

FORFEITURE ALLEGATION

Upon conviction of the offense set forth in counts 1 and 2 of this indictment, the defendant, ALEXANDRE ZDENEK DAVIS, shall forfeit, pursuant to 18 U.S.C. § 924(d), any firearms and ammunition involved in any knowing violation of said offenses.

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A TRUE BILL.

Foreperson signature redacted.
Original document filed under seal.

FOREPERSON



JESSE A. LASLOVICH
United States Attorney



CYNDEE L. PETERSON
Criminal Chief Assistant U.S. Attorney